

Legislative Audit Division

State of Montana



Report to the Legislature

November 1997

Limited Scope Performance Audit

Teacher Certification Process

Office of Public Instruction

Board of Public Education

Certification Standards and Practices Advisory Council

- ▶ **The process can be streamlined.**
- ▶ **Legislative clarification needed.**

**Direct comments/inquiries to:
Legislative Audit Division
Room 135, State Capitol
PO Box 201705
Helena MT 59620-1705**

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Performance audits conducted by the Legislative Audit Division are designed to assess state government operations. From the audit work, a determination is made as to whether agencies and programs are accomplishing their purposes, and whether they can do so with greater efficiency and economy. In performing the audit work, the audit staff uses audit standards set forth by the United States General Accounting Office.

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John W. Northey, Legal Counsel
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November 1997

The Legislative Audit Committee
of the Montana State Legislature:

This is our limited scope performance audit of the teacher certification process
administered at the Office of Public Instruction.

This report contains information on the teacher certification process and recommenda-
tions for strengthening this process. Responses from the Office of Public Instruction
and the Board of Public Education are contained at the end of the report.

We wish to express our appreciation to the staff of the Office of Public Instruction and
the Board of Public Education for their cooperation and assistance.

Respectfully submitted,

“Signature on File”

Scott A. Seacat
Legislative Auditor

Legislative Audit Division

Limited Scope Performance Audit

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Board of Public Education

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Members of the audit staff involved in this audit were Angie Grove and Mary Zednick.

Table of Contents

	List of Figures and Tables	iii
	Elected and Administrative Officials	iv
	Report Summary	S-1
Chapter I - Introduction	Introduction	1
	Audit Objective	1
	Audit Scope and Methodology	1
	Report Organization	2
Chapter II - Background	Introduction	3
	The Board of Public Education's Role	3
	The Certification Standards and Practices Advisory Council's Role	3
	OPI's Role	4
	How Do You Apply for a Certificate?	5
	Who Should Be Certified?	6
	Why Would a Certificate Be Denied, Revoked, or Suspended? . . .	8
	Certification Fees and Program Funding	10
Chapter III - The Process Can be Improved	Introduction	11
	Suggested Improvements From Teachers	11
	Request for Initial Application Forms	11
	Eliminating Overlapping Files	12
	Obtaining Application Forms	13
	Records Management	14
	Limitations of the Current Computer System	14
	Data Controls	15
	Microfilming Records	16
	Summary	18

Table of Contents

Chapter IV - Other Factors Affecting the Process

Introduction	19
The Process Has Inherent Inefficiencies	19
<i>Conclusion</i>	20
OPI and University Coordination	20
<i>Conclusion</i>	21
Other Issues Which Impact Coordination	21
Funding Issues	21
Defining Certification Classes	22
Summary	23

Agency Response

Office of Public Instruction	27
Board of Public Education	31

List of Figures & Tables

<u>Figure 1</u>	Major Certification Workload Duties Teacher Education and Certification Department	4
<u>Figure 2</u>	Number of Certificates Issued Monthly Calendar Years 1994-1996	5
<u>Table 1</u>	Teacher Certification Classes	7
<u>Table 2</u>	Comparison of Annual OPI and Records Management Bureau Microfilming Costs (November 1996)	17

Elected and Administrative Officials

Office of Public Instruction

Nancy Keenan, Superintendent

Bill Cooper, Deputy Superintendent

Don Freshour, Director, Teacher Education and Certification

Board of Public Education

Storrs Bishop, Chairperson

Term Expires

2/01/03

Joyce Silverthorne, Vice Chairperson

2/01/01

Sarah "Sally" Listerud

2/01/98

Bob Brown

2/01/04

Barbara Keim

2/01/00

Kirk Miller

2/01/02

Wilbur Anderson

2/01/99

Emily Danforth

6/30/98

Staff: Wayne Buchanan, Executive Secretary

Certification Standards & Practices Advisory Council

Richard Floren, Chairperson

6/01/98

Steven J. Gettel, Vice Chairperson

6/01/99

Bruce Dunkel

6/01/00

Bob Vogel

6/01/98

Don Robson

6/01/00

Mark D. Lalum

6/01/00

Pat Valencia

6/01/99

Introduction

Issuing a state certificate for teachers, administrators, and school specialists is a means of establishing a uniform system of quality education and identifying a level of professional standards. Montana state law dictates no person shall teach in the public schools until he/she has obtained a Montana teacher certificate. The Teacher Education and Certification Department within the Office of Public Instruction (OPI):

- ▶ Provides certification applications to interested persons.
- ▶ Evaluates submitted applications.
- ▶ Issues or denies certificates to applicants.
- ▶ Investigates potential revocation of current certificates.

Based upon our initial review of the program, our overall audit objective was to provide information and answer the following question:

-- Can the current teacher certification process be improved?

How Do You Apply for a Certificate?

To be initially certified to teach in Montana, the following minimum requirements must be met:

1. Be 18 years of age at the beginning of the school term;
2. Be of good moral and professional character; and,
3. Completed a teacher education program at an approved accredited institution.

Department staff issue certificates to applicants who submit acceptable evidence and a completed Montana certification application. Required evidence includes official college transcripts outlining teacher training courses completed and acceptable scores from prescribed national teacher aptitude examinations.

Although the application form requires character and ethical information, the certification system is primarily designed to ensure appropriate academic and educational backgrounds of teaching officials. OPI staff do not routinely perform thorough background checks or verify all application information on potential applicants and certifi-

Report Summary

cate holders. This responsibility is left to local school districts and superintendents who hire school staff.

If questions regarding the minimum standards relating to moral character or application evidence are raised, OPI staff can investigate further and if warranted, deny the application.

Why Would a Certificate Be Denied, Revoked, or Suspend?

A certificate application may be denied for several reasons: minimum education standards are not met; incomplete evidence is submitted; or issues relating to the applicant's moral or professional character are raised. OPI staff can, if needed, access criminal justice information, contact college officials, or interview previous employers to inquire about information included in an application. In addition, a national certification information system is reviewed to determine if the applicant has ever been denied, revoked, or suspended certification in another state. If staff determine required standards are not met or are in question, a certificate may be denied. OPI staff deny approximately 80 applications each year. Whenever OPI denies issuance or renewal of a certificate, the applicant may appeal the denial to the Board of Public Education (Board).

The Board may also issue a letter of reprimand, suspension, or revocation for the following reasons:

1. Making false statements of material fact in applying for a certificate.
2. Incompetency.
3. Gross neglect of duty.
4. Conviction of, entry of a guilty verdict, or a plea of no contest to a criminal offense involving moral turpitude.
5. Immoral conduct as defined in ARMs related to the teaching profession.
6. Substantial and material nonperformance of employment contract.
7. Denial, revocation, or suspension of a teacher, administrator, or specialist certificate in another state.

Procedures are also in place to appeal any decision made during this process. During the last fiscal year, five certificates were revoked and no certificates were suspended.

The Process Can be Improved

The current certification process administered by OPI entails 22 different steps including five different inspection procedures. We believe this process could be streamlined to 10 or 12 steps by addressing procedural inefficiencies and improving the management information system.

Request for Initial Application Forms

Based on our observations, the Request for Application Materials form could be eliminated and several extra procedures, such as evaluating qualifications prior to application or creating pending files, could be discontinued without weakening the overall certification process. OPI staff indicated the Request for Application Materials form was created to ensure applicants qualify prior to applying, to prevent receiving notarized applications that had to be denied. However, the Request for Application Materials form appears to only create a duplicate application process that results in an extra four steps in the process and time delays in obtaining a certificate.

Eliminating Overlapping Files

During the current process, a correspondence file is established when a request for information is received. After an application is sent, file information is transferred to another drawer and renamed a pending file. Currently, OPI maintains correspondence and pending file information for up to seven years. This requires additional staff time to track the information in two different types of files and can result in misplaced application information. The department should eliminate the overlapping file system to streamline the administrative process for certification.

Limitations of the Current Computer System

The teacher certification program utilizes a computer network to store a portion of certification records. Staff interviews and general observations noted several limitations with this system, including:

- ▶ Manual edits must be completed weekly rather than on-line.
- ▶ Complete certificate holder information is not easily accessed.

Report Summary

- ▶ No method exists to electronically transfer data between OPI and colleges.
- ▶ Limited program reports are available.

A good management information system should be designed to ensure staff can obtain information as needed and in a useful format. Interviews with OPI system staff and other system development professionals indicated a new, more useful management information system would cost approximately a maximum of \$100,000 in staff time and software. The department should also examine other cost-effective alternatives such as packaged software applications or systems utilized in other states. We believe the department should upgrade the existing system to address current limitations.

Microfilming Records

After applications are entered and certificates generated, application evidence (transcripts, recommendations, application form) is micro-filmed by OPI staff for storage. To determine if this was a cost effective option for OPI, we used Records Management Bureau rates to conduct a cost benefit analysis between current microfilm expenses and potential bureau charges. Our cost comparison for annual expenses for in-house processing estimated OPI costs at \$4,526. Estimated Records Management Bureau costs for the same services were \$953. A potential savings of \$3,572 was identified in this review.

The savings could be greater since this comparison does not take into account any equipment needs or updates that may be required at OPI and is based on conservative staff workload figures. Therefore, we conclude Records Management Bureau microfilm services appear to be a cost effective option for the OPI Teacher and Education Certification Department and would result in operational savings.

The Process Has Inherent Inefficiencies

Currently there are three primary groups involved in the teacher certification process: the Board of Public Education, the Certification Standards and Practices Advisory Council, and OPI. As provided in statute, these agencies create a system of checks and balances throughout the certification process; however, this system does not necessarily lend itself to a streamlined or efficient structure.

Duties between the various groups are closely interconnected and one group must rely on another group to achieve all the required goals of teacher certification. For example, although OPI is responsible for investigating reports from school districts on alleged misconduct, Board of Public Education action must be requested to actually revoke or suspend the certificate. This can create time delays in the revocation or suspension process and confusion on the part of certificate holders.

The current process, as statutorily defined, creates a level of inefficiency in the teacher certification process.

OPI and University Coordination

There are designated certification officers who review applications for initial teacher certification at: University of Great Falls, University of Montana (U of M)-Missoula, Montana State University (MSU)-Bozeman, MSU-Billings, MSU-Northern, U of M-Dillon, Carroll College, and Rocky Mountain College. These officers assist in preparing OPI applications, disseminate information to current and potential students about the certification process, and track student progress toward obtaining certification.

In effect, the colleges are conducting a major portion of the certification workload for issuing initial certificates. Program statistics for teacher certification show Montana colleges process approximately 800 applications annually. This accounts for 50 percent of the initial applications being reviewed at the college/university level.

Conclusion

Duplicate duties exist between OPI and college/university staff in evaluating initial applications; however, this overlap does not appear to negatively impact system efficiency.

Funding Issues

Certification application and renewal fees are distributed, via OPI staff, to the Board and the Advisory Council. One agency collects fees, another agency receives the fees, and the third agency (Advisory Council) spends the money. The agency spending the money does not perform the administrative duties, instead the Advisory Council uses this money for its operational costs and related program research. In the past, there have been limited activities for research. The only projects being conducted are

Report Summary

designed to examine the effect of a “mentoring program” for new teachers and professional development issues. As a result, the fund balance of the state special revenue account for certification fees has been increasing with an approximate balance of \$120,000 as of June 30, 1997.

Under current statutes, this money cannot be readily used to focus resources into a specific administrative area. One area where fees could be applied to provide additional support to the overall teacher certification process is to enhance the current computer system. This system does not meet program needs and estimated costs for improving this system are projected at a maximum of \$100,000. Fee revenue could supplement funding in this area or be utilized to study methods for improving management information and management support systems.

To address this area, OPI, the Board of Public Education, and the Advisory Council should jointly examine the current funding structure. A coordinated effort is required to ensure overall support for proposed changes.

Defining Certification Classes

The Board recently established a separate teacher certification class for American Indian Language and Culture teachers, Class 7. This is the first time the Board established a separate class beyond those listed in statute. Other teacher certification classes (Class 1 through Class 6) are statutorily defined in section 20-4-106, MCA. This statute outlines specific educational criteria for each certification class to ensure a statewide professional standard is met. For Class 7 certification, the Board has not established a statewide professional standard or any academic guidelines. Current ARMs state each individual tribe will establish criteria for this class and that criteria does not have to be formally provided to the Board. Although several tribes have developed application procedures, no formal criteria has been designated. Montana currently has seven recognized tribes. As a result, there could be seven different sets of criteria or no formally defined criteria for someone licensed as a Class 7 teacher.

The legislature did recognize the need to acknowledge the distinct and unique cultural heritage of American Indians within our educational system. Section 20-4-212, MCA, outlines its policy and commitment to preserving this heritage. But developing a separate standard for one specific class appears to conflict with the overall mission of developing a uniform and orderly system of teacher certification as required in section 20-4-102, MCA. Lack of academic and professional standards also puts OPI in the awkward position of issuing, revoking, or denying applications for certification without established guidelines to use as a basis for those decisions. Without clear criteria in these areas, the department may experience difficulty in enforcing a decision. The Board should seek clarification for standards relating to Class 7 to ensure statewide consistency and strengthen its position in enforcing Board policy.

Summary

Overall, we found the teacher certification process in Montana is operating as intended. Although the system has inherent inefficiencies illustrated by the numerous groups involved in the process, few concerns were identified. A survey of certificate holders documented a high satisfaction with the process. Other involved groups, such as college staff and Board staff, noted OPI staff are helpful and readily available for providing assistance. No major areas of non-compliance were noted during our review. The suggestions and recommendations noted in this report highlight enhancements to increase the efficiency and improve the process.

Chapter I - Introduction

Introduction

Issuing a state certificate for teachers, administrators, and school specialists is a means of establishing a uniform system of quality education and identifying a level of professional standards. Montana state law dictates no person shall teach in the public schools until he/she has obtained a Montana teacher certificate. The Teacher Education and Certification Department within the Office of Public Instruction (OPI):

- ▶ Provides certification applications to interested persons.
- ▶ Evaluates submitted applications.
- ▶ Issues or denies certificates to applicants.
- ▶ Investigates potential revocation of current certificates.

Performance audit work at the Teacher Education and Certification Department was requested by the Legislative Audit Committee. Our limited scope performance audit concentrated on examining these responsibilities and the roles of other groups involved in the process. (Further discussion of the various groups is outlined in Chapter II and Chapter IV.)

Audit Objective

Based upon our initial review of the program, our overall audit objective was to provide information and answer the following question:

- Can the current teacher certification process be improved?

Audit Scope and Methodology

Audit work focused on the overall teacher certification process and identified potential areas for increasing efficiency. We addressed our audit objective by conducting testing in the following areas:

- ▶ Current work flow of the certification process and possible electronic alternatives.
- ▶ Records management and information sharing.
- ▶ Duties and functions between the various involved groups.
- ▶ Legal restrictions and definitions which effect the process.

Management processes used to direct staff and organize operations were identified. Potential process in efficiencies and improvements

Chapter I - Introduction

were reported. Current time delays and process bottlenecks were highlighted.

Methods to provide information to the public and interested applicants were reviewed, including electronic and manual data systems. Records management issues were addressed by examining the storage methods used for past records, reviewing possible electronic alternatives, and examining how the current management methods impact data accuracy and usefulness.

Program coordination and communication were researched. We examined the role of OPI staff versus the role of various staff involved with the Board of Public Education and the Certification Standards and Practices Advisory Council. College and university staff tasks were documented and areas of potential increased efficiency were highlighted. Legal research was conducted to note the overall effect on process efficiency or identify statutory restrictions.

This audit was conducted in accordance with governmental auditing standards for performance audits.

Report Organization

The report is organized into four chapters. Chapter II is a general overview of the teacher certification process. Chapters III and IV outline suggestions for improving the process and potential areas of increased efficiency.

Chapter II - Background

Introduction

This chapter provides a general overview of the Montana teacher certification process. The certification process is defined in sections 20-4-101 through 20-4-403, MCA, and is administered by the Board of Public Education (Board), a Certification Standards and Practices Advisory Council, and the Superintendent of Public Instruction (OPI).

The Board of Public Education's Role

Created by the Montana Constitution, the Board is comprised of seven members, appointed by the Governor. The Board develops certification policies which prescribe procedures for issuing teacher, administrator, and specialist certificates. The Board also has authority to approve policies and processes relating to denial, suspension, and revocation of certificates. Major responsibilities include:

- ▶ Issuing suspensions and revocations.
- ▶ Conducting appeal hearings on denials, suspensions, or revocations.
- ▶ Issuing letters of reprimand.
- ▶ Approving policy.

The Certification Standards and Practices Advisory Council's Role

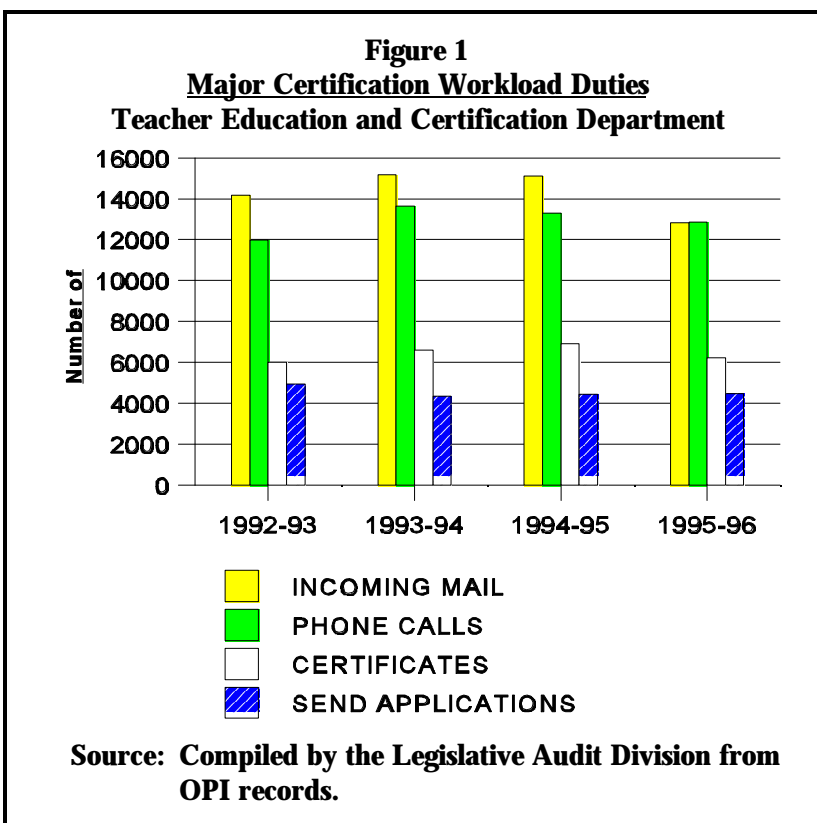
In addition to the Board, there is a Certification Standards and Practices Advisory Council which is responsible for studying and recommending changes to certification and education requirements for teachers, administrators, and specialists. As prescribed in section 2-15-1522, MCA, council members are appointed by the Board and include teachers from various grade levels, a specialist, an administrator, one school board trustee, and faculty from accredited teacher education programs. This council meets quarterly to discuss certification issues such as education requirements, renewal procedures, and ethical guidelines. Council recommendations are presented to the Board for consideration.

Chapter II - Background

OPI's Role

The Teacher Education and Certification Department within OPI administers the actual process of issuing certificates. The program director reports directly to the deputy superintendent and oversees OPI's role in the prescribed certification process. Duties include drafting certification standards and approving college teacher education programs. In addition to the program director, three certification specialists are responsible for certification duties.

Four principal areas consume the majority of certification specialist's time. These include: dealing with incoming mail items, mailing out certification applications, answering phone calls, issuing certificates, and evaluating application evidence. The following figure indicates these duties and the number handled annually by OPI staff.

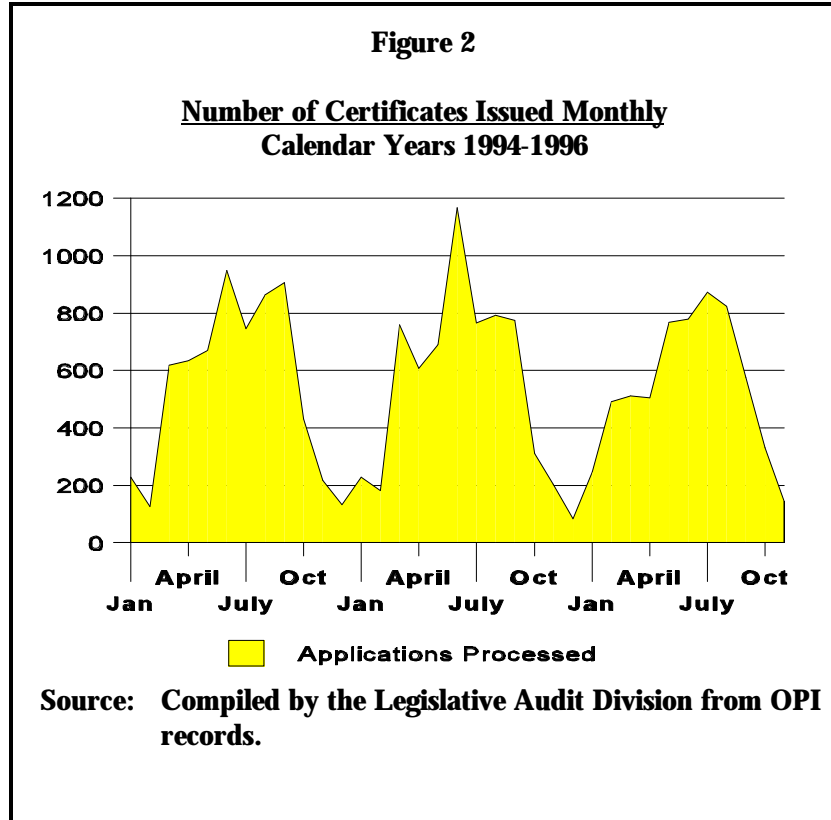


Staff focus on issuing or denying certificates and collecting certification fees. There are approximately 23,000 current certificate

Chapter II - Background

holders. Approximately 6,500 initial and renewal certificates are issued annually.

The following figure notes the number of certificates issued monthly during calendar years 1994, 1995, and 1996.



How Do You Apply for a Certificate?

To be initially certified to teach in Montana, the following minimum requirements must be met:

1. Be 18 years of age at the beginning of the school term;
2. Be of good moral and professional character; and,
3. Completed a teacher education program at an approved accredited institution.

Chapter II - Background

The Montana initial application form requests information relating to these requirements and must be notarized prior to submission to OPI. In addition, the applicant must subscribe to the following oath:

“I solemnly swear (or affirm) that I will support The Constitution of the United States of America and The Constitution of the State of Montana.”

Department staff issue certificates to applicants who submit acceptable evidence and a completed Montana certification application. Required evidence includes official college transcripts outlining teacher training courses completed and acceptable scores from prescribed national teacher aptitude examinations. There are designated certification officers who review applications for initial teacher certification at: University of Great Falls, University of Montana (U of M)-Missoula, Montana State University (MSU)-Bozeman, MSU-Billings, MSU-Northern, WMC-U of M, Carroll College, and Rocky Mountain College.

Although the application form requires character and ethical information, the certification system is primarily designed to ensure appropriate academic and educational backgrounds of teaching officials. OPI staff do not routinely perform thorough background checks or verify all application information on potential applicants and certificate holders. This responsibility is left to local school districts and superintendents who hire school staff.

If questions regarding the minimum standards relating to moral character or application evidence are raised, OPI staff can investigate further and if warranted, deny the application.

This is the process followed for initial application for certification. The process for renewal or reinstatement of Montana certification does not require all these prescribed steps.

Chapter II - Background

Who Should Be Certified?

To recognize the different categories of teaching professions, seven certificate classes are available. Six classes are outlined in state statute and the seventh was recently developed by Board policy. Certificate classes are identified in Table 1.

Table 1
Teacher Certification Classes

➤ <u>Class 1 (PROFESSIONAL)</u>	Complete a bachelor degree teacher education program and a minimum 1 year study beyond. (5,200)*
➤ <u>Class 2 (STANDARD)</u>	Complete a 4-year bachelor degree teacher education program. (13,900)*
➤ <u>Class 3 (ADMINISTRATIVE)</u>	Complete standard training & training required by the Board for superintendents, principals, supervisors. (1,600)*
➤ <u>Class 4 (VOCATIONAL)</u>	Complete standard training & requirements of United States Office of Education or those required by special educational fields. (80)*
➤ <u>Class 5 (PROVISIONAL)</u>	Complete a 4-year college program & provide evidence of intent to qualify for Class 1 or 2. (1,700)*
➤ <u>Class 6 (SPECIALIST)</u>	Training, experience, & license required under other professional standards if approved by the Board; such as school psychologists and counselors. (250)*
➤ <u>Class 7 (AMERICAN INDIAN LANGUAGE & CULTURE)</u>	Criteria to be designated by each Montana tribe. (25)*

*Approximate number of valid certificates.

Source: Compiled by the Legislative Audit Division.

Certificates for most classes are valid for five years and must be registered with the county superintendent where the holder is to teach within 60 days after the teacher starts work. Class 5 provisional certification is issued for either one year for a specialist or three years for teaching or administrative positions. These applicants generally have not completed an education major, have not

Chapter II - Background

successfully completed designated tests for certification, or lack recent education credits.

Certificates expire on June 30th of the last valid year. Continuing education requirements for renewal and re-instatement of certificates are evaluated at that time. Applicable criteria for application, renewal, and re-instatement is generally outlined in statutes and administrative rules.

In addition to classification, certificates are separated further into various categories of expertise. These categories include levels and endorsements. A level is a designation of the various grade levels the certificate holder is authorized to teach. For example, a Level 1 means the certificate holder is authorized to teach in grades kindergarten through eighth (K-8).

An endorsement designation is a method to identify the appropriate subjects the holder is authorized to teach. For example, an endorsement of 14 indicates the certificate holder is qualified to teach geography. There are 45 Board approved teaching endorsements in Montana, with four categories designated for administrative areas and two for specialist classes.

Why Would a Certificate Be Denied, Revoked, or Suspended?

A certificate application may be denied for several reasons: minimum education standards are not met; incomplete evidence is submitted; or issues relating to the applicant's moral or professional character are raised. OPI staff can, if needed, access criminal justice information, contact college officials, or interview previous employers to inquire about information included in an application. In addition, a national certification information system is reviewed to determine if the applicant has ever been denied, revoked, or suspended certification in another state. If staff determine required standards are not met or are in question, a certificate may be denied. OPI staff deny approximately 80 applications each year. Whenever OPI denies issuance or renewal of a certificate, the applicant may appeal the denial to the Board.

Requests to suspend or revoke a teacher, specialist or administrator certificate must be brought before the Board by an official of the

local school district or the Superintendent of Public Instruction. These requests should specify whether revocation or suspension is sought and should include:

- ▶ Information on the specific charge(s).
- ▶ An outline of the facts and evidence related to the charges.
- ▶ A copy of minutes documenting the board of trustees decision.

Upon receipt of the request, the Board solicits an investigation by OPI staff to determine if substantial reason exists to hold a hearing for revocation or suspension. Based on the preliminary investigation, the Board determines whether or not to hold a hearing.

The Board may issue a letter of reprimand, suspension, or revocation for the following reasons:

1. Making false statements of material fact in applying for a certificate.
2. Incompetency.
3. Gross neglect of duty.
4. Conviction of, entry of a guilty verdict, or a plea of no contest to a criminal offense involving moral turpitude.
5. Immoral conduct as defined in ARMs related to the teaching profession.
6. Substantial and material nonperformance of employment contract.
7. Denial, revocation, or suspension of a teacher, administrator, or specialist certificate in another state.

Procedures are also in place to appeal any decision made during this process. During the last fiscal year, five certificates were revoked and no certificates were suspended.

Chapter II - Background

Certification Fees and Program Funding

Certification fees include a \$6 initial filing fee and an additional \$6 for each year. For example, when applying for Class 1 certification for the first time, the fee would be \$36 (initial filing fee plus \$6 for each of the five years). Teachers wishing to hold two or more certificates in different classes must apply simultaneously and pay the required fee for each class.

By statute, all fees go to the Certification Standards and Practices Advisory Council. Three dollars of each fee is used for council administration and \$3 is to be used for research at the Board's discretion. Fee revenues amount to approximately \$200,000 annually. The current budget for council operations is approximately \$85,000. Remaining funds can be used for various related research projects. As required in statute, this research shall be in areas relating to:

- ▶ Teacher education requirements.
- ▶ Renewal requirements.
- ▶ Professional practices and ethical conduct.

Research projects currently funded include examining the use of mentors for new teachers and methods for improving professional development of teachers.

Annual teacher certification expenditures are funded with General Fund moneys at approximately \$150,000. These funds are used for personal services primarily. Program operation costs related to legal, management information, and general overhead are not included.

Chapter III - The Process Can be Improved

Introduction

The current certification process administered by OPI entails 22 different steps including five different inspection procedures. We believe this process could be streamlined to 10 or 12 steps by addressing procedural inefficiencies and improving the management information system. The following sections discuss the proposed changes.

Suggested Improvements From Teachers

We sent out 100 questionnaires to current Montana certificate holders. Our sample included all classes of certificate holders, including administrators, specialists, and provisional certificate holders. Overall, we found certificate holders who responded to our survey (58 percent) are generally satisfied with the current process, however several minor improvements were suggested. Suggestions included making forms more readily available and providing renewal forms prior to January so they can be submitted as early as possible. Certificate holders felt these changes would reduce the number of contacts needed with OPI staff.

Request for Initial Application Forms

The current certification process requires a potential applicant call or write to OPI to obtain a Request for Application Materials form prior to obtaining an actual Certification Application form. The Request for Application Materials form, along with copies of transcripts, is used by OPI staff to conduct a pre-screening to determine the qualifications of the potential applicant. OPI staff compare qualifications outlined on the Request for Application Materials form to the type of certification requested by the potential applicant. After conducting an initial evaluation, OPI staff either send:

- ▶ An application form and indicate what type of certification can be applied for with the current qualifications (which may be different than requested).
- ▶ A letter requesting additional information to determine qualifications.
- ▶ A form letter which states documented qualifications do not meet minimum certification standards.

Chapter III - The Process Can be Improved

Based on our observations, the Request for Application Materials form could be eliminated and several extra procedures, such as evaluating qualifications prior to application or creating pending files, could be discontinued without weakening the overall certification process. OPI staff indicated the Request for Application Materials form was created to ensure applicants qualify prior to applying, to prevent receiving notarized applications that had to be denied. However, the Request for Application Materials form appears to only create a duplicate application process that results in an extra four steps in the process and time delays in obtaining a certificate.

Other states, such as Washington, Alaska and Wyoming, put responsibility on the applicants to submit all required information and complete application forms. Incomplete information is immediately sent back, not tracked by the certifying agency. None of the other six states contacted require a request for an application form prior to sending an actual application form. The department should eliminate the Request for Application Materials form to streamline the teacher certification process.

Eliminating Overlapping Files

During the current process, a correspondence file is established after initial materials are received. After an application is sent, file information is transferred to another drawer and renamed a pending file. Currently, OPI maintains correspondence and pending file information for up to seven years. This requires additional staff time to track the information in two different types of files and can result in misplaced application information.

This filing system was developed based on the use of the Request for Application Materials form process. The department should eliminate the overlapping file system to streamline the administrative process for certification.

Chapter III - The Process Can be Improved

Recommendation #1

We recommend the department streamline the teacher certification process by:

- A. Eliminating the Request for Initial Application Materials form.**
- B. Eliminating overlapping correspondence files.**

Obtaining Application Forms

Teacher certification statutes restrict the application period to January 1 through July 1 each year. OPI staff, referring to this statute, do not provide application or renewal forms until after January 1 each year. In addition, OPI staff tightly control the number of applications distributed and who can provide those forms. Application forms are distributed in bundles of no more than 100 to colleges and universities and are not readily available in the school districts. Renewal forms are not readily provided to the colleges or school districts.

The application and renewal forms are not numbered and do not contain confidential information, therefore it is unclear why disbursing forms is restricted. Although staff indicated they do not want forms out there they do not know about, college staff stated forms distributed to potential applicants are not tracked and photocopied forms have been sent in for processing.

Recommendation #2

We recommend the department make certification forms readily available throughout the year from various sources.

Chapter III - The Process Can be Improved

Records Management

In addition to identifying duplicate or unnecessary steps in the process, we examined the management information system used by OPI. We found the current management information system does not provide useful information in a timely manner and cannot be used efficiently by program staff.

Limitations of the Current Computer System

The teacher certification program utilizes a computer network to store a portion of certification records. Staff interviews and general observations noted several limitations with this system, including:

- ▶ Manual edits must be completed weekly rather than on-line.
- ▶ Complete certificate holder information is not easily accessed.
- ▶ No method exists to electronically transfer data between OPI and colleges.
- ▶ Limited program reports are available.

Due to these limitations, staff do not rely on the computer system as a primary information resource. Paper reports must be generated to supplement system information in order to ensure staff accessibility to all program information. Staff use these reports to identify current certification information because data on the electronic system cannot be accessed without generating a certificate or is scattered in several different locations on the screens available.

System limitations have created an inefficient use of staff resources and duplication in program information maintained. It appears little communication occurs between OPI program staff and system support staff. Clearly defined system needs have not been developed or discussed between staff within the various functions. Due to the small size of the teacher certification program, this has not been a priority for OPI system staff.

A good management information system should be designed to ensure staff can obtain information as needed and in a useful format. Interviews with OPI system staff and other system development professionals indicated a new, more useful management information system would cost approximately a maximum of \$100,000 in staff time and software. The department should also examine other cost-effective alternatives such as packaged software applications or

Chapter III - The Process Can be Improved

systems utilized in other states. We believe the department should upgrade the existing system to address current limitations.

Recommendation #3

We recommend the department examine cost-effective alternatives to upgrade the current computer system.

Data Controls

Applications for teacher certification are received in the mail room, then transferred to the Teacher and Education Certification Department for processing. Prior to processing by certification staff, applications are stored in individual work areas throughout the office such as tabletops and staff desks. No formal “count” of applications is completed prior to data entry and no method exists to ensure all applications are input. With no method to safeguard applications, they are occasionally misplaced.

In addition, the department does not have procedures for tracking electronic data. The number of certificates generated are not compared to the number of applications entered. An input log could be developed to document the number of applications input. Then the number of applications input could be reconciled with the number of certificates generated to obtain verification applications are entered on the electronic data system. Improved controls would ensure the accuracy and completeness of program data after processing.

Developing controls for processing teacher applications could assure the conversion of application data into electronic data and generated certificates.

Recommendation #4

We recommend the department develop a system of controls to safeguard application data during the certification process.

Chapter III - The Process Can be Improved

Microfilming Records

After applications are entered and certificates generated, application evidence (transcripts, recommendations, application form) is microfilmed for storage. Due to the large volume of information and staff turnover, a backlog of 14 months of microfilming currently exists. We reviewed this area to determine if other options were available to improve the efficiency of microfilming records. Initially, we contacted Records Management Bureau staff within the Secretary of State's office to discuss services available, associated costs, and potential time frames for providing offered services. Records Management staff indicated additional services and efficiencies of scale in the bureau generally result in cheaper and more timely services than agencies doing this work themselves.

To determine if this was a cost effective option for OPI, we used Records Management Bureau rates to conduct a cost benefit analysis between current microfilm expenses and potential bureau charges. To compare costs, we estimated the cost of OPI staff performing microfilm services. Using job descriptions and budgeted salary amounts, we calculated current OPI staff costs for performing microfilming duties to be approximately \$4,335 annually.

After estimating OPI staff costs, we identified other department expenses associated with in-house service. Other costs include film, back-up film, and processing fees. We compared these total costs to the service rates quoted by Records Management Bureau for similar services. The following table notes our cost comparison for annual microfilm expenses between current in-house OPI services and potential costs of Records Management Bureau services.

Chapter III - The Process Can be Improved

Table 2
Comparison of Annual OPI and Records Management Bureau Microfilming Costs
(November 1996)

	ESTIMATED OPI COSTS	RECORDS MGT. BUREAU COSTS	POTENTIAL SAVINGS
FILM/PROCESSING	\$ 77.76	\$600.00	\$ (522.24)
DUPLICATES	77.76	77.76	0.00
QUALITY CONTROL	36.00	36.00	0.00
JACKETING		240.00	(240.00)
STAFF COSTS	\$4,335.20	Included in Processing	4,335.20
TOTAL COSTS	\$4,526.72	\$953.76	\$3,572.96

Source: Compiled by the Legislative Audit Division.

The savings could be greater since this comparison does not take into account any equipment needs or updates that may be required at OPI and is based on conservative staff workload figures. Therefore, we conclude Records Management Bureau microfilm services appear to be a cost effective option for the OPI Teacher and Education Certification Department and would result in operational savings.

Another consideration in reviewing microfilming options may be a timeliness issue. Teacher certification records are often accessed to answer in-coming requests for information, updated materials, etc. This requires information be readily available. With the current OPI backlog, access to records is not as timely as it could be. Records Management Bureau staff indicated a two day turn around could be provided for the current teacher certification workload. This appears to provide a more timely turn-around with limited impact on current operations.

Chapter III - The Process Can be Improved

Recommendation #5

We recommend the department contract for microfilming services.

Summary

By addressing these areas, the overall teacher certification process could become more streamlined and efficient. After reviewing the portion of the process completed by OPI, we examined the involvement of other groups and other factors which impact the process. The last chapter discusses our findings in this area.

Chapter IV - Other Factors Affecting the Process

Introduction

The final step in evaluating the teacher certification process was to examine the involvement of various groups and agencies. Other involved parties include: Board of Public Education, Certification Standards and Practices Advisory Council, and certification officers at colleges/universities. This chapter outlines our findings and suggested improvements.

The Process Has Inherent Inefficiencies

Currently there are three primary groups involved in the teacher certification process: the Board of Public Education, the Advisory Council, and OPI. As provided in statute, these agencies create a system of checks and balances throughout the certification process; however, this system does not necessarily lend itself to a streamlined or efficient structure.

Duties between the various groups are closely interconnected and one group must rely on another group to achieve all the required goals of teacher certification. An example of the reliance between groups is illustrated by the revocation and suspension process. Although OPI is responsible for investigating reports from school districts on alleged misconduct, if sufficient grounds exist, Board of Public Education action must be requested to actually revoke or suspend the certificate. This can create time delays in the revocation or suspension process and confusion on the part of certificate holders.

Another example involves policy and procedure development. Certification policies are developed by the Board but actual procedures to implement the policies are developed at OPI. Therefore, procedures are not always specifically what the Board envisioned when formulating the applicable policy. Interviews with staff involved in policy and procedure development indicated inconsistencies occasionally occur. For example, although the Board approved Class 7 as a separate certification class, technically OPI staff are issuing a “specialists” certificate. This interpretation of the policy may be slightly different than envisioned by Board members. Any variances or inconsistencies between Board policies and actual procedures followed are difficult to resolve. Based on the current

Chapter IV - Other Factors Affecting the Process

statutory restrictions, each agency must perform their specified functions regardless of the overall process inefficiency.

Conclusion

The current process, as statutorily defined, creates a level of inefficiency in the teacher certification process.

OPI and University Coordination

In addition to the roles of the state boards and agencies, we visited with staff at Montana colleges and universities involved in certifying teachers through their applicable teacher education programs. There are designated certification officers who review applications for initial teacher certification at: University of Great Falls, University of Montana (U of M)-Missoula, Montana State University (MSU)-Bozeman, MSU-Billings, MSU-Northern, U of M-Dillon, Carroll College, and Rocky Mountain College. These officers assist in preparing OPI applications, disseminate information to current and potential students about the certification process, and track student progress toward obtaining certification.

Our review focused on identifying overlapping duties and potential processing duplication. Duties performed at both the colleges/universities and OPI include evaluating initial certification applications, reviewing transcripts, and collecting fees. Management information maintained at each college or university unit is also duplicated and sent to OPI. College certification officers send completed applications, transcripts, and other supporting evidence to OPI weekly for processing. OPI staff rely on the application review completed through the colleges and do not complete a separate evaluation.

In effect, the colleges are conducting a major portion of the certification workload for issuing initial certificates. Program statistics for teacher certification show Montana colleges process approximately 800 applications annually. This accounts for 50 percent of the initial applications being reviewed at the college/university level. OPI oversight is limited to annual meetings held to discuss upcoming changes and to exchange program information.

Chapter IV - Other Factors Affecting the Process

Conclusion

Duplicate duties exist between OPI and college/university staff in evaluating initial applications; however, this overlap does not appear to negatively impact system efficiency.

Other Issues Which Impact Coordination

In addition to functional overlaps, several other issues were raised within the teacher certification process which resulted from overlapping duties and responsibilities. These issues include the current fee and funding system and new certification classifications. The following sections discuss our findings and observations in these areas.

Funding Issues

Unlike other professional licensing fees, certification fees do not actually support the function of issuing certificates. Instead, fees can only be spent for Certification Standards and Practices Advisory Council administration and to address various study areas recommended by the advisory council and the Board.

Currently, certification application and renewal fees are distributed, via OPI staff, to the Board and the Advisory Council. One agency collects fees, another agency receives the fees, and the third agency (Advisory Council) spends the money. The agency spending the money does not perform the administrative duties. The Advisory Council uses this money for its operational costs and related program research. In the past, there have been limited activities for research. The only projects being conducted are designed to examine the effect of a “mentoring program” for new teachers and professional development issues. As a result, the fund balance of the state special revenue account for certification fees has been increasing with an approximate balance of \$120,000 as of June 30, 1997.

Under current statutes, this money cannot be readily used to focus resources into a specific administrative area. One area where fees could be applied to provide additional support to the overall teacher certification process is to enhance the current computer system. This system does not meet program needs and estimated costs for improving this system are projected at a maximum of \$100,000. Fee revenue could supplement funding in this area or be utilized to

Chapter IV - Other Factors Affecting the Process

study methods for improving management information and management support systems.

To address this area, OPI, the Board of Public Education, and the Advisory Council should jointly examine the current funding structure. A coordinated effort is required to ensure overall support for proposed changes.

Recommendation #6

We recommend OPI, the Board of Public Education, and the Advisory Council agree upon and seek legislation to redefine the funding structure for the teacher certification process to provide support for program administration.

Defining Certification Classes

The Board recently established a separate teacher certification class for American Indian Language and Culture teachers, Class 7. This is the first time the Board established a separate class beyond those listed in statute. Other teacher certification classes (Class 1 through Class 6) are statutorily defined in section 20-4-106, MCA. This statute outlines specific educational criteria for each certification class to ensure a statewide professional standard is met. For Class 7 certification, the Board has not established a statewide professional standard or any academic guidelines. Current ARMs state each individual tribe will establish criteria for this class and that criteria does not have to be formally provided to the Board. Although several tribes have developed application procedures, no formal criteria has been designated. Montana currently has seven recognized tribes. As a result, there could be seven different sets of criteria or no formally defined criteria for someone licensed as a Class 7 teacher.

The legislature did recognize the need to acknowledge the distinct and unique cultural heritage of American Indians within our educational system. Section 20-4-212, MCA, outlines its policy and commitment to preserving this heritage. But developing a separate standard for one specific class appears to conflict with the overall mission of developing a uniform and orderly system of teacher

Chapter IV - Other Factors Affecting the Process

certification as required in section 20-4-102, MCA. Lack of academic and professional standards also puts OPI in the awkward position of issuing, revoking, or denying applications for certification without established guidelines to use as a basis for those decisions. Without clear criteria in these areas, the department may experience difficulty in enforcing a decision. The Board should seek clarification for standards relating to Class 7 to ensure statewide consistency and strengthen its position in enforcing Board policy.

Recommendation #7

We recommend the Board seek legislative clarification on specific academic and professional guidelines for Class 7 certification.

Summary

Overall, we found the teacher certification process in Montana is operating as intended. Although the system has inherent inefficiencies illustrated by the numerous groups involved in the process, few concerns were identified. A survey of certificate holders documented a high satisfaction with the process. Other involved groups, such as college staff and Board staff, noted OPI staff are helpful and readily available for providing assistance. No major areas of non-compliance were noted during our review. The suggestions and recommendations noted in this report highlight enhancements to increase the efficiency and improve the process.

Agency Response

The Office of Public Instruction

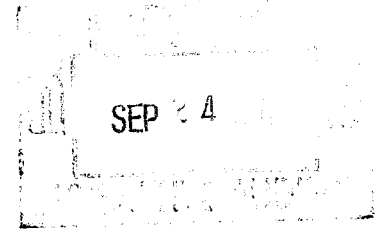
Nancy Keenan
State Superintendent



State Capitol
PO Box 202501
Helena, Montana 59620-2501
(406) 444-7362
FAX No. (406) 444-2893

September 22, 1997

TO THE LEGISLATIVE AUDIT COMMITTEE
OF THE MONTANA STATE LEGISLATURE



Following is the response of the Office of Public Instruction to the audit recommendations contained in the **Teacher Certification Process** report.

#1 Streamline Teacher Certification Process: We recommend the department streamline the teacher certification process by:

- A. Eliminating the Request for Initial Application Materials form.
- B. Eliminating overlapping correspondence files.

OPI Response: The Request for "Initial" Application Materials form will be eliminated for all in-state renewals by OPI Certification as of October, 1997. Out-of-state applicants will submit a revised evaluation request form. Overlapping correspondence files have been consolidated into one set of files as recommended.

#2 Readily Available Certification Forms: The department should make certification forms readily available throughout the year from various sources.

OPI Response: Applications for renewal of teaching certificates are currently available on OPI's Internet Home Page. Applications will also be available in quantity to county superintendents as a replacement for the "Request for Application Materials" form.

Applications for initial certification are currently on OPI's Internet Home Page, with further refinement included in plans for redesigning our certification process.

Internet access and county superintendent application copies will be available throughout the year.

OPI Response to Legislative Audit Report
September 22, 1997
Page 2

#3 Upgrade of Computer System:

We recommend the department examine cost-effective alternatives to upgrade the current computer system.

OPI Response: The Office of Public Instruction is currently planning for the automation (or further automation) of several of its business processes and the ultimate conversion of its production systems to Oracle, the state standard for database management systems. The Teacher Certification process is one of several to be evaluated in OPI's systems review. It is the intention of the Office of Public Instruction that the Teacher Certification system will fit into an integrated database of OPI production systems.

Once the infrastructure for an office wide information management system is designed, OPI can efficiently and effectively proceed with the overhaul of its current production systems. In the interim, OPI will engage in a review of cost-effective options for improving the existing Teacher Certification process and production system. These improvements may include on-line edits and increased data security measures.

#4 Application Controls and Safeguards:

We recommend the department develop a system of controls to safeguard application data during the certification process.

OPI Response: Certificates, upon issue (printing) and prior to mailing, are now matched with application forms. The issue dates are entered on the Accounting Daily Cash Receipts file for each certificate produced. This confirms that each application form for which data has been entered has a certificate issued and that the payment form records the date of that issue.

#5 Contract for Microfilming Services:

We recommend the department contract for microfilming services.

OPI Response: OPI Certification is in the process of contracting with Records Management Bureau, Secretary of State, for the microfilming of all certification documents. Weekly issue documents are planned to be microfilmed under contract beginning early in October 1997.

OPI Response to Legislative Audit Report
September 22, 1997
Page 3

#6 Funding the Teacher Certification Process:

We recommend OPI, the Board of Public Education, and the Advisory Council agree upon and seek legislation to redefine the funding structure for the teacher certification process to provide support for program administration.

OPI Response: The Office of Public Instruction is prepared to initiate dialogue with the Board of Public Education to seek legislation to redefine the funding structure for the teacher licensing process, to include the on-going development and updating of standards for state program approval, so that program administration can be adequately funded.

#7 Legislative Clarification of Class 7 Certification:

We recommend the Board seek legislative clarification on specific academic and professional guidelines for Class 7 certification.

OPI Response: The Office of Public Instruction stands ready to assist the Board of Public Education and/or respond to requests from legislative sources.

As the state agency assigned the administrative function of certifying and de-certifying Montana's teachers, administrators and specialists for our state's schools and children, it is gratifying to undergo this performance audit and find that "the teacher certification process is operating as intended." It has been the intention of the Superintendent of Public Instruction to provide a "helpful and readily available staff" to serve Montana's educators and others who seek information related to teacher certification. The audit team's observation that this is the situation is appreciated.

Although no major noncompliance issues were noted, you may observe that the recommendations which were presented have been taken seriously. We also wish to increase the "efficiency and improve the process" of teacher certification.


We wish to express particular appreciation to Angie Grove and Mary Zednick for their diligence in establishing an understanding of this complex operation. Their grasp of operational analysis and persistence in seeking clarification made this a rewarding

OPI Response to Legislative Audit Report
September 22, 1997
Page 4

experience for the certification staff and supervisory personnel. The initial agency orientation to the performance audit process by Deputy Legislative Auditor Jim Pellegrini was also appreciated.

We appreciate the opportunity to respond to the audit report.

Sincerely,

A handwritten signature in cursive script, appearing to read "William M. Cooper".

William Cooper
Deputy Superintendent

State of Montana



Board of Public Education

2500 Broadway
PO Box 200601
Helena, Montana 59620-0601
(406) 444-6576

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EXECUTIVE SECRETARY:

Wayne Buchanan, PH.D.

August 25, 1997

Jim Pellegrini
Deputy Legislative Auditor
Room 135, State Capitol
P.O. Box 201705
Helena, MT 59620-1705

Dear Mr. Pellegrini:

The following is a response to the draft Limited Scope Performance Audit on the Teacher Certification Process dated July 30, 1997. First, I would like to commend you and your audit staff for an excellent comprehensive report on the teacher certification process. For the major portion of the report, I will recommend that the Board do everything in its authority to comply with the recommendations therein. The lone exception is Recommendation #7 having to do with the Class 7 certification as currently defined in rule 10.57.407 ARM.

The Class 7 certificate was adopted by the Board on December 12, 1995 in response to a request by several Montana Indian tribes to provide a means to certify individuals to teach Indian language and culture. Previous to the adoption of this rule, school districts wishing to employ otherwise non-certified people who possessed special knowledge of a particular native language and culture, such as tribal elders, were required to use the Emergency Authorization to Teach as provided in 20-4-10, (1) MCA. Tribal spokespeople pointed out that this classification denoted an emergency situation of a temporary nature, which did not accurately describe the positions held by these individuals. The Board subsequently agreed in principle to address these concerns.

The Board recognized the legal implications of developing another certificate classification and at first considered going to the Legislature for statutory authorization. However, a review of present law indicated that this would not be necessary. Section 20-4-106 (1), MCA, sets forth five separate classifications of teacher certificates. In addition, subsection (2) provides that the Board may issue specialist certificates to: "... an otherwise qualified applicant who has the training, experience, and license required under the standards of the board of public education for the certification of a profession

other than the teaching profession.” The phrase, “other than the teaching profession” raised questions but this was resolved by further reference to 20-4-101, MCA, which states in part: “and no person shall be permitted to teach in the public schools of the state until he has obtained a teacher certificate *or specialist certificate* or the district has obtained an emergency authorization of employment from the state.” (Emphasis supplied)

Accordingly, the Board adopted 10.57.407 ARM, Class 7 American Indian Language and Culture Specialist, which allows a school district to assign an individual to *specialist services* within this specific area “under such supervision as the district may deem appropriate.” It was anticipated by the Board that some of the individuals in this classification may be of advanced years and thus unable to handle a full schedule of teaching responsibilities so the amount and type of supervision and assistance was left to the discretion of the local school district administration.

As your report correctly notes, the usual practice for teacher certification has been for the Board to establish the qualifications for a particular certificate and to ask the schools of education to verify that candidates had successfully completed the specified preparation. The Board made the decision to allow the various tribes to establish the qualifications for the Class 7 Specialist certificate for what it considered to be several persuasive reasons.

The first was that no university in this state or any other, that the Board was aware of, currently has a course of study that would prepare an individual to teach a specific Montana Indian tribe’s language and culture. Furthermore, no campus has the personnel with the qualifications to determine that an individual has the appropriate knowledge and expertise to teach a particular language and culture. Thus, if the Board accepted the premise that such a classification was desirable, as it did, then who but the tribes could judge the adequacy of an applicant’s preparation?

As you correctly point out in the draft report, this could result in seven different sets of criteria for the Class 7 Certificate. In addressing this issue, it was brought to the attention of the Board that each of the tribes has different human resources with respect to individuals fluent in a particular language and culture. For example, the Crow Tribe has a relatively large number of fluent speakers of its language, a number of whom have teaching certificates. Other tribes have very few native speakers and many of these are quite old with

limited education. A rule that might be entirely reasonable for the Crows would likely exclude other tribes from qualifying any individuals for the Class 7 Certificate.

This state, as well as many others, has a long history of prescribing for Native Americans what is best for them. In this instance, the Board felt that perhaps the decision was best left to them. After all, it is their language and culture that faces extinction in the near future. It would be presumptive, at the very least, to establish a set of state qualifications to certify individuals in this area perhaps to the exclusion of others whom the tribes may feel are better qualified.

I believe that a fair examination of the record in this matter will show that the Board acted in a prudent manner after attempting to consider all the legal and practical aspects of the proposed rule. At the forefront of the deliberations was the affirmative responsibility with which the state is charged in Title X, Section 1, of the Montana Constitution: "(2) The state recognizes the distinct and unique cultural heritage of the American Indians and is committed in its educational goals to the preservation of their cultural heritage."

In the final analysis, however, it may have been the self limiting nature of this issue that was the most persuasive. In a very few years all of those people who remember how it was to have lived as Indians will be gone. Along with them will go the core of a culture that this planet will never see again. It only makes sense to put as many of these folks as we can in front our young people in the time remaining and afford them what state authority is available. The Class 7 isn't much, but it's the best the Board could do.

Sincerely,

A handwritten signature in black ink that reads "Wayne Buchanan". The signature is written in a cursive, flowing style.

Wayne Buchanan